this petition, the Commission should grant the partial reconsideration of its Report and Order as requested herein, and should clarify the several points discussed above.

Respectfully submitted,

UNITED STATES TELEPHONE ASSOCIATION

Bv:

Martin T. McCue Vice President and General Counsel

900 19th St., N.W.

Suite 800

Washington, D.C. 20006

(202) 835-3114

August 5, 1993

Suite 286

Lawrence P. Keller

Norcross, GA 30092

3300 Holcomb Bridge Rd.

Cathey, Hutton & Assoc., Inc.

## RECOMMENDED WORDING FOR CARRIER COMMON LINE ADJUSTMENT UNDER SECTIONS 61.39(b) AND 61.50(k)

## Section 61.39

§ 61.39 . . .

\* \*

(b) . . .

\* \*

(3) For a tariff change, the local exchange carrier that is a cost schedule carrier must propose Common Line rates based on the following:

- (i) For the local exchange carrier's initial filing, the Carrier Common Line revenue requirement shall be determined by a cost of service study for the 12-month base period. The Carrier Common Line revenue requirement shall be divided by the initial 12-month base period demand multiplied by a factor equal to one plus 1/2 of the Carrier Common Line minutes of use growth from the initial base period over the proceeding 12-month period.
- (ii) For the local exchange carrier's subsequent filings, the Carrier Common Line revenue requirement shall be determined by a cost of service study for the 24-month base period. The Carrier Common Line revenue requirement shall be divided by the 24-month base period demand multiplied by a factor equal to one plus 1/2 of the Carrier Common Line minutes of use growth from the initial base period over the proceeding 24-month base period.
- (4) For a tariff change, the local exchange carrier which is an average schedule carrier must propose common line rates based on the following:
- (i) For the local exchange carrier's initial filing, the most recent annual common line settlement from the National Exchange Carrier Association. This Carrier Common Line settlement amount shall be determined by a cost

of service study for the 12-month base period. The Carrier Common Line revenue requirement shall be divided by the initial 12-month base period demand multiplied by a factor equal to one plus 1/2 of the Carrier Common Line minutes of use growth from the initial base period over the proceeding 12-month period.

(ii) For the local exchange carrier's subsequent filings, an amount calculated to reflect the average schedule pools settlement the carrier would have received if the carrier had continued to participate, based upon the most recent average schedule common line formulas developed by the National Exchange Carrier Association. The Carrier Common Line settlement amount shall be divided by the 24-month base period demand multiplied by a factor equal to one plus 1/2 of the Carrier Common Line minutes of use growth from the initial base period over the proceeding 24-month base period.

Section 61.50

§ 61.50 . . .

(k) Local exchange carriers filing common line rates under this section must propose Carrier Common Line rates based on the following:

- (1) For the local exchange carrier's initial filing, the Carrier Common Line revenue requirement shall be determined by a cost of service study for the 12-month base period. The Carrier Common Line revenue requirement shall be divided by the initial 12-month base period demand multiplied by a factor equal to one plus 1/2 of the Carrier Common Line minutes of use growth from the initial base period over the proceeding 12-month period.
- (2) For the local exchange carrier's subsequent filings, the Carrier Common Line revenue requirement shall be determined by a cost of service study for the 24-month base period. The Carrier Common Line revenue requirement shall be divided by the 24-month base

**ATTACHMENT** page 3

period demand multiplied by a factor equal to one plus 1/2 of the Carrier Common Line minutes of use growth from the initial base period over the proceeding 24-month base period.

## CERTIFICATE OF SERVICE

I, Robyn Davis, do hereby certify that copies of the foregoing Reply Comments of the United States Telephone Association were sent via first class mail, postage paid, to the following on this 5th day of August, 1993:

Kathleen B. Levitz\*
Acting Chief
Common Carrier Bureau
Federal Communications
Commission
Room 500
1919 M Street, NW
Washington, DC 20554

Gregory J. Vogt\*
Chief, Tariff Division
Federal Communications
Commission
Room 518
1919 M Street, NW
Washington, DC 20554

Dan Grosh\*
Federal Communications
Commission
Room 518
1919 M Street, NW
Washington, DC 20554

Ann Stevens\*
Federal Communications
Commission
Room 518
1919 M Street, NW
Washington, DC 20554

Mary Brown\*
Federal Communications
Commission
Room 500
1919 M Street, NW
Washington, DC 20554

Andrew Mulitz\*
Federal Communications
Commission
Room 500
1919 M Street, NW
Washington, DC 20554

I.T.S.\*
2100 M Street, NW
Suite 140
Washington, DC 20037

Francine J. Berry, Esq.
David P. Condit, Esq.
Sandra Williams Smith, Esq.
295 North Maple Avenue
Room 3244J1
Basking Ridge, NJ 07920

Counsel for American Telephone and Telegraph Company

Paul Rodgers, Esq.
Charles D. Gray, Esq.
James Bradford Ramsey, Esq.
National Association of
Regulatory Utility
Commissioners
1102 ICC Building
PO Box 684
Washington, DC 20044

\* Hand Delivered

Paul Berman, Esq.
Covington & Burling
1201 Pennsylvania Ave., NW
Washington, DC 20044

Counsel for Puerto Rico Telephone Company

Lisa M. Zaina, Esq.
OPASTCO
2000 K Street, NW
Suite 205
Washington, DC 20006

Joanne Salvatore Bochis, Esq. The National Exchange Carrier Association, Inc. 100 S. Jefferson Road Whippany, NJ 07981

David Cosson, Esq.
L. Marie Guillory, Esq.
The National Telephone
Cooperative Association
2626 Pennsylvania Ave., NW
Washington, DC 20037

Thomas J. Moorman, Esq. John Staurulakis, Inc. 6315 Seabrook Road Seabrook, MD 20706

Thomas P. Kerester, Esq.
Barry Pineles, Esq.
Office of Advocacy
United States Small Business
Administration
403 3rd Street, NW
Washington, DC 20416

Robert A. Mayer, Esq.
Nixon, Hargrave, Devans &
Doyle
One Thomas Circle, NW
Suite 800
Washington, DC 20005

Counsel for The Lincoln Telephone and Telegraph Company

Carolyn C. Hill, Esq.
ALLTEL Service Corporation
1710 Rhode Island Ave., NW
Suite 100
Washington, DC 20036

Gregory J. Darnell Manager Regulatory Analysis MCI Telecommunications Corporation 1801 Pennsylvania Ave., NW Washington, DC 20006

Thomas E. Taylor, Esq. William D. Baskett III, Esq. Christopher J. Wilson, Esq. Frost & Jacobs 2500 Central Trust Center 201 East Fifth Street Cincinnati, OH 45202

Counsel for Cincinnati Bell Telephone Company

Carol F. Sulkes Vice President - Regulatory Policy Central Telephone Company 8745 Higgins Road Chicago, IL 60631 Theodore D. Frank, Esq. Vonya B. McCann, Esq. Arent, Fox, Kinter, Plotkin & Kahn 1050 Connecticut Ave., NW Washington, DC 20036-5339

Counsel for Central Telephone Company

Marc A. Stone
Manager Regulatory/Legislative Affairs
Fred Williamson & Assoc., Inc.
2921 E. 91st Street
Suite 200
Tulsa, OK 74137-3300

Calvin K. Simshaw, Esq. PTI Communications 805 Broadway PO Box 9901 Vancouver, WA 98668-8701

Lorinda Ackley President Taconic Telephone Corp. Taconic Place Chatham, NY 12037

Michael R. Coltrane President The Concord Telephone Company 68 Cabarrus Ave., E PO Box 227 Concord, NC 28026-0227

Jay Preston President Ronan Telephone Company 312 Main Street, SW Ronan, MT 59864 James U. Troup, Esq.
Arter & Hadden
1801 K Street, NW
Suite 400K
Washington, DC 20006-1301

Counsel for Tallon, Cheeseman and Associates, Inc.

Alline of Mais
Robyt Davis